



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: **NICHOLAS RUSSO**

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 4/9/2008, AGAINST MOS RUSSO:

1. FAILED TO NOTIFY EMD OF ADDRESS CHANGE
CASE CLOSED ON 10/27/2008

Disclosure #2:

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

1. ELIZABETH S OWUSU V. CITY OF NY, ET AL. 25389-11, FILED IN KINGS COUNTY SUPREME COURT

Disclosure #3:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 10/24/2018, AGAINST MOS RUSSO:

1. INVOICE DISCREPANCY - LAB - CONTROLLED SUBSTANCE
 2. REPORT INCOMPLETE/INACCURATE - PROPERTY CLERK INVOICE
- CASE CLOSED ON 12/13/2018

Disclosure #4:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 11/25/2020, AGAINST MOS RUSSO:

1. REPORT INCOMPLETE/INACCURATE - PROPERTY CLERK
- CASE STATUS: CLOSED
CLOSED DATE: 2021 -01 -27
ACTION TAKEN: VERBAL OF INSTRUCTIONS

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH FEBRUARY 16, 2021, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney